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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

6:21-cr-00198-MC

v.

SETTLEMENT AGREEMENT

ANDREW AARON LLOYD,

Defendant.

The United States and claimant Charles Schwab & Co., Inc., (“Schwab”) and its authorized counsel, Brad S. Daniels, have agreed to settle its claim to the funds held in Charles Schwab Account xx4724, in accord with the following terms.

IT IS AGREED by and between the undersigned parties as follows:

This agreement has no effect on any claims that any other department or agency of the United States may have against defendant Andrew Lloyd or Charles Schwab & Co., Inc.

The United States agrees to return to Charles Schwab & Co., Inc. \$1,789,592.47, which includes interest.

Claimant Schwab hereby agrees to release and to hold the United States, and any agents, servants, and employees of the United States, or any state or local law enforcement agency, acting in their individual or official capacities, harmless from any claim, whether presently or

hereinafter known, made by themselves arising from and on account of the seizure of the above-described assets.

The parties will each bear their own costs and their own attorney's fees in this matter.

The parties agree, pursuant to 28 U.S.C. § 2465(a)(2), there was reasonable cause for the seizure and arrest of the property and neither the persons who made the seizure or arrest nor the prosecutors shall be liable to suit or judgment on account of such suit or prosecution, nor shall the claimant be entitled to costs.

All persons signing this agreement have read and understand each and every provision herein. This Settlement Agreement is entered into freely and voluntarily. By signing this Settlement Agreement, the parties merely intend to settle the claims made in this litigation. Each person signing this Settlement Agreement is fully authorized to do so, whether on his or her own behalf or as representative for or on behalf of any other party or claimant herein.

This Court shall retain jurisdiction in this cause for the purpose of enforcing the terms of this agreement.

/s/ Gregory M. Scanlon
Greg Scanlon, Managing Director
Claimant Charles Schwab & Co., Inc.

December 29, 2021
DATE

/s/ Brad S. Daniels
Brad S. Daniels,
Attorney for claimant Schwab

December 29, 2021
DATE

s/ Gavin W. Bruce
Gavin W. Bruce
Assistant United States Attorney
Attorney for the United States of America

January 3, 2022
DATE